



ConnectTo Communications, Inc.

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June 29, 2012

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554
Re: WC Docket No. 11-42

To Whom It May Concern:

Please be advised that ConnectTo Communications, Inc. (further referred to as "the ETC") is applying for participation in the Broadband Adoption Lifeline Pilot Program (WC Docket No. 11-42). Please be advised that the following is true under penalty of perjury:

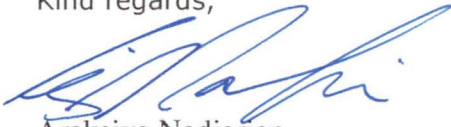
- (A) That the ETC intends to offer broadband service pursuant to the Commission's rules and regulations for the Lifeline program;
- (B) That the ETC will implement all necessary procedures and efforts to prevent waste, fraud and abuse in connection with its participation in the Pilot Program, including but not limited to procedures that the ETC will have in place to prevent duplicate broadband subsidies within its subscriber base, and procedures the carrier undertakes to de-enroll subscribers receiving more than one broadband discount per household;
- (C) That the ETC's broadband service offering(s) will provide sufficiently low latency to enable use of real-time applications such as Voice over Internet Protocol (VoIP) and if there are usage limits for each plan, that they are reasonably comparable to usage limits for comparable broadband offerings in urban areas;¹ and
- (D) That the ETC will participate in the collection and sharing of anonymized qualitative and quantitative data with standardized data elements, formatting, and submission requirements, and that the ETC will participate in workshops to discuss interim and final results of the project, and

¹

how best to use limited universal service funds to increase low-income consumers' adoption of broadband services.²

Thank you and please don't hesitate to contact me should you have any questions.

Kind regards,



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